

I. Remarks

Claims 1-20 are pending in the present application. In the Office Action dated January 25, 2006 (the "Office Action"), the Examiner rejected claims 1-3, 5, 7-9, 11-13, 15-16 and 18-20 under 35 U.S.C. §102(b) as being anticipated by "Efficient Algorithms for Sorting and Synchronization" by Andrew Tridgell ("*Tridgell*"). This rejection is respectfully traversed.

With respect to claim 1, it specifically requires the act of "storing at least a portion of said target file checking data in a cache." This act, in combination with other claimed acts, allows efficiently analyzing the stored target file checking data (*see, e.g.*, page 10, lines 6-11 of the present application). This feature, in combination with other recited claimed features, is not described in *Tridgell*. Although the Examiner cited pages 101-102 of *Tridgell*, the cited portion only mentions a "64KB cache" in passing. The cite portion does not describe that the "64KB cache" is used to store "at least a portion of said target file checking data," which is explicitly required in claim 1. Independent claims 15 and 20 require similar features. Also, independent claims 11 and 19 require "cached target file checking data." Hence, all independent claims and their respective rejected dependent claims are patentably distinguishable from *Tridgell*.

The Examiner also rejected claims 4, 6, 10, 14 and 17 under 35 U.S.C. §103(a) as being obvious over *Tridgell*. This rejection is respectfully traversed.

Claims 4, 6, 10, 14 and 17 are patentably distinguishable from *Tridgell* because these claims also require the feature of "storing at least a portion of said target file checking data in a cache" or "cached target file checking data." In addition, these claims recite other patentably distinguishable features. For instance, claim 6 requires "said target file checking data stored in a cache are used with multiple updating requests received from a plurality of clients." First, as noted above, *Tridgell* does not teach or suggest using a cache to store the target file checking data. Second, since *Tridgell* does not teach or suggest using a cache to store the target file checking data, *Tridgell* certainly does not teach or suggest using "said target file checking data stored in a cache" "in multiple updating requests received from a plurality of clients." Hence, claim 6 is patentably distinguishable from *Tridgell*.

An early and favorable reconsideration and allowance of the pending claims is respectfully requested.

AUTHORIZATION

The Commissioner is hereby authorized to charge any additional fees, which may be required for this Amendment, or credit any overpayment to deposit account no. 08-0219.

In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to deposit account no. 08-0219.

Respectfully submitted,



Anthony H. Kahng
Registration No. 42,704

WILMER CUTLER PICKERING HALE AND DORR LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006
TEL: 202.663.6138
FAX: 202.663.6363
DATE: June 26, 2006 (Monday)